REMARKS

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of December 28, 2007.

Reconsideration of the Application is requested.

The Office Action

Claim 38 stands objected because line 3 recites the phrase "one indirect storing characteristic" which should seemingly read "one indirect story characteristic". Appropriate correction is required.

Claims 1, 7-15, 37 and 38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the article "Topic Detection and Tracking Pilot Study Final Report" be Allan et al. (hereinafter Final Report) in view of the article "Relevance Models for Topic Detection and Tracking" by Lavrenko et al. (hereinafter Relevance Models) in view of Bluhm et al. (hereinafter Bluhm), U.S. Patent No. 7,085,755.

Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Final Report in view of Relevance Models in view of Bluhm, and further in view of Li et al. (hereinafter Li), U.S. Patent Application No. 2006/0062451.

Claims 3-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Final Report in view of Relevance Models in view of Bluhm, and further in view of Lantrip et al. (hereinafter Lantrip), U.S. Patent No. 6,584,220.

Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Final Report in view of Relevance Models in view of Bluhm, and further in view of the article "On-line New Event Detection and Tracking" by Allan et al. (hereinafter New Event Detection).

Claims 35-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Relevance Models in view of Bluhm.

Claims 1-15 and 35-39 remain in this application. Claims 1, 35 and 38 are currently amended. Claim 39 is new.

Claim Objections

Claim 38 is amended herein to replace the phrase "one indirect storing characteristic" with the phrase "one indirect story characteristic" as suggested in the Office Action.

Claims 1, 7-15, 37 and 38 Are Distinguished
From The Cited Art

Turning to section 4, (page 5) of the Office Action, it is stated while the combination of Final Report and Relevance Models discloses a story corpus and a new story, the combination fails to disclose the limitations of a source-identified story corpus and source-identified new story. The Office Action further states, however, that Bluhm discloses managing a large corpus of documents including the further limitations of a source-identified story corpus and a source-identified new story. Applicants respectfully traverse this interpretation of Bluhm.

While it is true that cited col. 6, lines 33-47 of Bluhm describes documents prepared by an author or source, and cited col. 7, lines 27-42 describes a document record including such fields as title and author/publisher, the Office Action does not show where this information necessarily describes the actual source of the document stored as part of the corpus. To the contrary in fact, cited col. 22, lines 1-10 of the Bluhm reference teaches that certain references may not be sufficient to describe a particular document. The example provided in the Bluhm reference seems to imply that a document from differing sources creates problems for embodiments described by Bluhm, and in such cases, the system retrieves all versions of a particular document so the user can select the document of interest. It seems that the document source is not a functional requisite of the Bluhm system, but rather is only supplementary documentation provided in the document record and is not essential to embodiments described by Bluhm. For example, FIG. 8 of Bluhm shows an intake process 800, as described in col. 10, lines 47-60 which describes receiving files transmitted from a source. The Office Action does not show where Bluhm describes storing or associating the source with the stored document.

Regardless of the above, however, even if the Bluhm reference were to teach storing and associating the source of each document with the document, there is no teaching or suggestion in the Bluhm reference for using the source of the document as part of an inter-story same event-same source characteristic. Nor does the Office Action show where the Bluhm reference combines the source information and event information to determine a same event-same source characteristic as recited in claim 1, as amended. At most the Bluhm reference simply describes the use of the story source as a search term for a user. Claim 1, as amended, recites a limitation for determining "at least one story characteristic based on an average story similarity story characteristic and a same event-same source story characteristic." The claim further recites "determining at least one adjustment to the inter-story similarity metrics based on at least one story characteristic." Because the adjustment is based on the story characteristic, and the story characteristic is based partly on the same event-same source characteristic, the adjustment would also be based on the same event-same source characteristic. Combining the Bluhm reference with the Final Report reference and the Relevance Models reference would not teach or fairly suggest using the story source in determining either the story characteristic or the adjustment to the story characteristic based on the same event-same source characteristic.

For at least the above-stated reasons, Applicants submit that claim 1, as amended, is distinguished. By reason of dependence from claim 1, Applicants submit that claims 2-15 and 37 are also distinguished.

With attention to claim 38, claim 38 has been similarly amended, and Applicants respectfully submit the arguments and discussions related to the Bluhm reference are equally applicable to this claim. Applicants therefore that submit that claim 38, as amended, is distinguished.

Claims 35-36 Are Distinguished
From The Cited Art

Turning to section 8, (page 16) of the Office Action, the limitation of "determining an indicator of inter-story similarity between the first and second story based on at least one of: an event frequency model, story segmentation and a source-identified inter-story

similarity metric, wherein the event frequency model is periodically automatically updated" is discussed. It is there stated that the limitation recites at least one of an event frequency model, story segmentation and a source-identified inter-story similarity metric; in this instance an event frequency model is not being used. The subject limitation of claim 35 has been amended as follows: "determining an indicator of inter-story similarity between the first and second story based on <u>an event frequency model and</u> at least one of: ~~an event frequency model,~~ story segmentation and a source-identified inter-story similarity metric, wherein the event frequency model is periodically automatically updated." The recited limitation, as amended, now requires the use of the event frequency model thereby distinguishing over the cited references.

For at least the above-stated reasons, Applicants submit that claim 35, as amended, is distinguished. By reason of dependence from claim 1, Applicants submit that claim 36 is also distinguished.

New Claim 39

Lastly, new claim 39 further defines the aspects of the subject matter not taught or fairly cited in the prior art.

CONCLUSION

For the reasons detailed above, it is submitted all remaining claims (Claims 1-15 and 35-39) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

☒   Remaining Claims, as delineated below:

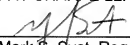| (1) For	(2) Claims Remaining After Amendment Less Highest Number Previously Paid For		(3) Number Extra
Total Claims	20	- 37 =	0
Independent Claims	3	- 6 =	0

☒   This is an authorization under 37 CFR 1.136(a)(3) to treat any concurrent or future reply, requiring a petition for extension of time, as incorporating a petition for the appropriate extension of time.

☒   The Commissioner is hereby authorized to charge any filing or prosecution fees which may be required, under 37 CFR 1.16, 1.17, and 1.21 (but not 1.18), or to credit any overpayment, to Deposit Account 24-0037.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

FAY SHARPE LLP

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Date

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